

Theresa Noble Hill

From: Theresa Noble Hill
Sent: Monday, April 16, 2007 3:04 PM
To: 'RGarren@riggsabney.com'; 'Trevor.Hammons@oag.ok.gov'
Cc: Lori A. White; 'Mann, Dara D.'; 'Bond, Michael R.'; 'phixon@mcdaniel-lawfirm.com'; 'Paul Thompson'; 'vbronson@cwlaw.com'; 'rsanders@youngwilliams.com'; 'jgriffin@lathropgage.com'
Subject: RE: 2/15/07 ESI Order

Rick and Trevor,

To confirm where we finally ended today, it is our understanding that you will get back to us as the representation of the additional agencies, offices and divisions of the State. Furthermore, it our understanding that we have a basic difference of opinion as to the scope of the ESI Orders entered by the Court, Dkt. Nos. 996 and 1125. The Defendants believe that the Orders require to Parties to address information that is discoverable in this action as provided by Rule 26. See Order Implementing Rules for Discovery of ESI, Dkt. 996, para. 1.(A). and Rule 26(b). Whereas the State believes that the Orders are limited to the Initial Disclosure Requirements contained in Rule 26 (a)(1).

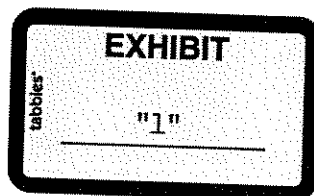
We look forward to any additional information that you may provide regarding the representation of the additional agencies, offices and divisions of the State of Oklahoma. If you cannot provide this information to us by the end of this week as you hope, please let us know.

Theresa N. Hill

Rhodes Hieronymus
OKLAHOMA

100 West 5th Street, Suite 400
Tulsa, Oklahoma 74103-4287
Telephone: 918/582-1173
Facsimile: 918/592-3390
thill@rhodesokla.com

CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended only for the person or entity to which it is addressed and may contain confidential and /or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. If you are the intended recipient but do not wish to receive communications through this medium, please so advise the sender immediately.



4/24/2007